

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBS-ELKENANEY P/K/A TRACY
WOLFF, et al.,

Defendants.

Case No. 1:22-cv-02435-LLS-SN

**DECLARATION OF STEPHEN M.
DONIGER IN SUPPORT OF
PLAINTIFF'S MOTION TO EXCLUDE
A PORTION OF THE TESTIMONY OF
MALCOLM COULTHARD AND THE
TESTIMONY OF ROSE HILLIARD IN
ITS ENTIRETY**

DECLARATION OF STEPHEN M. DONIGER

I, Stephen M. Doniger, hereby declare as follows:

1. I am above eighteen (18) years of age, am counsel of record in this case for Plaintiff Lynne Freeman and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge except where otherwise indicated. If called as a witness, I could and would competently testify as set forth below.
2. Attached hereto as Exhibit 1 is a true and correct copy of the rebuttal expert report of Rose Hilliard offered by Defendants in this case.
3. Attached hereto as Exhibit 2 is a true and correct copy of the rebuttal expert report of Malcolm Coulthard offered by Defendants in this case.
4. Attached hereto as Exhibit 3 is a true and correct copy of the opening expert report of Emily Easton offered by Defendants in this case.
5. Attached hereto as Exhibit 4 is a true and correct copy of the rebuttal expert report of Emily Easton offered by Defendants in this case.

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6. Attached hereto as Exhibit 5 is a true and correct copy of the expert report of Carole Chaski offered by Plaintiff in this case.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Executed on December 22, 2023 in Los Angeles, California.

By: /s/ Stephen M. Doniger

Stephen M. Doniger

Declarant